

**CRIMINAL COMPLAINT
(Electronically Submitted)**

United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
v. Guillermo ACOSTA DOB: 1969; United States Citizen	MAGISTRATE'S CASE NO. 23-06298MJ
Complaint for violation of Title 18, United States Code, § 554(a)	

On or about November 25, 2023, in the District of Arizona, **Guillermo ACOSTA** knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: one (1) Century Arms AK-47 Rifle; one (1) U.S. Palms 7.62x39 Magazine; and 1,000 rounds of TELA AMMO 7.62x39 ammunition, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Section 554(a).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

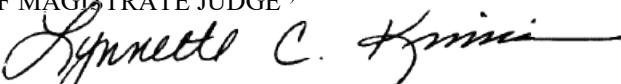
On November 25, 2023, at approximately 4:24 p.m., **Guillermo ACOSTA** attempted to exit the United States and enter the Republic of Mexico through the DeConcini Port of Entry in Nogales, Arizona. Customs and Border Protection Officers (CBPOs) were conducting outbound inspections when they stopped a black in color 2015 Nissan Altima bearing Arizona license plate number EKA95G driven by sole occupant **Guillermo ACOSTA**. **ACOSTA** is not the registered owner of the vehicle. The CBPO asked **ACOSTA** if he had any currency over \$10,000, weapons, or ammunition to declare to which he denied having any of these items. The CBPO asked **ACOSTA** where he was going, and he stated he was going to Mexico to meet some clients for his trucking company. A Z-Portal x-ray scan of the vehicle was positive for anomalies in the trunk. CBPOs inspected the vehicle and discovered 1,000 rounds of TELA AMMO 7.62x39 ammunition concealed in a speaker box located inside the trunk. A further inspection of the vehicle resulted in the discovery of one (1) Century Arms AK-47 rifle and one (1) U.S. Palms 7.62x39 magazine concealed under the rear seat.

During a *post-Miranda* statement, **ACOSTA** initially denied having any knowledge of the weapons and ammunition, however, he later admitted to having financial problems and in need of money. **ACOSTA** stated he knew he had something but was unsure of what it was. However, when **ACOSTA** was asked what he thought it was, **ACOSTA** stated that he believed it was money or weapons. **ACOSTA** said he was promised \$300 for the trip. **ACOSTA** stated he was approached by a mechanic he knew named Jesus. Jesus was aware of **ACOSTA**'s financial problems and offered him money in exchange for the smuggling trips to Nogales, Sonora.

(BASIS OF COMPLAINT CONTINUED ON REVERSE.)

MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A

DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY AUSA <u>R. Arellano</u>	SIGNATURE OF COMPLAINANT  Digitally signed by GUILLERMO A CARRERA Date: 2023.11.27 11:15:14 -07'00' OFFICIAL TITLE HSI Task Force Agent Guillermo A. Carrera
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Sworn by telephone <u>x</u> SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE November 27, 2023
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¹⁾ See Federal Rules of Criminal Procedure Rules 3, 4.1, and 54

(BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED.)

ACOSTA stated he was told to leave the keys inside the Altima vehicle and was later notified that it was ready. **ACOSTA** stated he was supposed to contact Jesus as soon as he/**ACOSTA** crossed the border for further instructions.

The firearm, ammunition, and magazine found in the vehicle qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license. **ACOSTA** does not possess a license to export weapons or ammunition into Mexico.

